

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FIVE HUNDRED SIXTEENTH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS FOR
WHICH THE COMMONWEALTH IS NOT LIABLE

Upon the *Five Hundred Sixteenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims for which the Commonwealth is Not Liable* [ECF No. 22253] (the “Five Hundred Sixteenth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (the “Commonwealth”), dated September 16, 2022, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Five Hundred Sixteenth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Sixteenth Omnibus Objection and to grant the relief requested therein

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Five Hundred Sixteenth Omnibus Objection.

pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Five Hundred Sixteenth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Five Hundred Sixteenth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be claims for which the Commonwealth is not liable; and the Court having determined that the relief sought in the Five Hundred Sixteenth Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Sixteenth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Five Hundred Sixteenth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 22253 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Sixteenth Omnibus Objection

Five Hundred Sixteenth Omnibus Objection

Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	BIOIMAGENES MEDICAS BIOPLAZA BUILDING 2638 HOSTOS AVE., SUITE 101 CARR #2 KM. 150.3 BO. ALGARROBO MAYAGÜEZ, PR 00682	05/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	24807	\$47,230.91
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
2	CAMERA MUNDI INC PO BOX 6840 CAGUAS, PR 00726-6840	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	18172	\$15,601.90
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
3	CAMERA MUNDI INC PO BOX 6840 CAGUAS, PR 00726-6840	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	23226	\$25.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.						
4	CARLOS FLORES CE & L FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR 00960	05/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	11075	Undetermined*
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						

Five Hundred Sixteenth Omnibus Objection

Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	22556	\$24,965.97
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
6	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	30912	\$446.16
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$246.16 in the agency's system. Additionally, invoice totaling \$200.00 was paid via EFT 00089334 on 07/05/2018.						
7	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	50208	\$2,876.95
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with invoices 0000165861, 0000165863, 0000165864, 0000165865, 0000165866, 0000165867, 0000326958, 0000334693, 0000334694, 0000335713, and 0000340206 in the agency's system. Claim #50208 also contained on Exhibit A to the 391st Omnibus Claims Objection for Modified Claims.						
8	DAT@ACCESS HÉCTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	10764	\$2,032.80
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						

Five Hundred Sixteenth Omnibus Objection

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
9	DAT@ACCESS HÉCTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	10765	\$14,009.18
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
10	DAT@ACCESS COMMUNICATIONS, INC HECTOR FIGUEROA-VINCENTY ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/04/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9442	\$51,559.26
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$35,114.26 in the agency's system. Additionally, invoice totaling \$16,445.00 was paid via check 2473 on 06/26/2018.						
11	DJ AIR GROUP CORP PO BOX 10403 SAN JUAN, PR 00922	05/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	29793	\$51,946.50
Reason: Proof of claim purports to assert liability on the basis of submitted invoices and purchase orders. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with the invoice or purchase order totaling \$1,132.50 in the agency's system. Additionally, invoices totaling \$26,730.00 were paid via check 83309 on 05/24/2018. The remaining liabilities totaling \$24,084.00 are duplicative to claim 173934.						
12	DUST CONTROL SERVICES OF P.R. INC. PO BOX 362048 SAN JUAN, PR 00936-2048	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	111557	\$2,556.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$1,470.00 in the agency's system. Additionally, invoices totaling \$1,086.00 were paid via checks 00186556, 00187609, 00194543, 00195798, 00197876, 00198824, 00202196, 00202872, 00204175, 00204979, and 00238607 on 03/19/2009, 04/17/2009, 07/23/2009, 08/20/2009, 10/09/2009, 10/29/2009, 01/22/2010, 01/28/2010, 02/12/2010, 02/25/2010, and 11/03/2011.						

Five Hundred Sixteenth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
13	DUST CONTROL SERVICES OF P.R., INC. P. O. BOX 362048 SAN JUAN, PR 00936-2048	06/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	137438	\$25.25
	Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.					
14	GREATAMERICA FINANCIAL SERVICES CORPORATION ATTN: PEGGY UPTON PO BOX 609 CEDAR RAPIDS, IA 52406	02/19/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	501	\$29,800.30*
	Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.					
15	LANDFILL TECHNOLOGIES OF FAJARDO PO BOX 1322 GURABO, PR 00778	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	27807	\$2,168.00
	Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices totaling \$1,628.00 in the agency's system. Additionally, invoice totaling \$540.00 was paid via check 00135659 on 04/06/2017.					
16	MILLER & CHEVALIER CHARTERED 900 16TH ST NW WASHINGTON, DC 20006-2901	05/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	22059	\$154,508.75
	Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system. Claim #22059 also contained on Exhibit A to the 391st Omnibus Claims Objection for Modified Claims.					

Five Hundred Sixteenth Omnibus Objection

Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
17	NATIONAL ASSOCIATION OF STATE BUDGET OFFICERS 444 N. CAPITOL ST. NW WASHINGTON, DC 20001	05/10/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	11506	\$5,600.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.						
18	NETWAVE EQUIPMENT CO. HÉCTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	17379	\$6,000.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.						
19	NETWAVE EQUIPMENT CO. HÉCTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/03/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9021	\$16,200.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
20	QUEST DIAGNOSTICS OF PUERTO RICO, INC. CAPARRA GALLERY CALLE ORTEGON #107 LOCAL 105 GAUYNABO, PR 00966	06/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	86557	\$63.20
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.						

Five Hundred Sixteenth Omnibus Objection

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
21	RAMOS PIZARRO, ERIEL E URB LA ALAMEDA 800 ESMERALDA STREET SAN JUAN, PR 00926-5818	05/24/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	20539	\$7,980.00
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
22	RODRIGUEZ RODRIGUEZ, FELIX CITY OFFICE SUPPLIES PO BOX 1669 BAYAMON, PR 00960	07/03/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	152644	\$1,782.30
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.						
23	RODRIGUEZ RODRIGUEZ, FELIX CITY OFFICE SUPPLIES PO BOX 1669 BAYAMON, PR 00960	07/03/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	154213	\$1,120.80
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
24	RODRIGUEZ RODRIGUEZ, FELIX CITY OFFICE SUPPLIES PO BOX 1669 BAYAMON, PR 00960	07/03/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	154522	\$8,699.45
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						

Five Hundred Sixteenth Omnibus Objection

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	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
25	RODRIGUEZ RODRIGUEZ, FELIX CITY OFFICE SUPPLIES PO BOX 1669 BAYAMON, PR 00960	07/03/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	154950	\$3,181.08
Reason: Proof of claim purports to assert liability on the basis of submitted invoices. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with these invoices in the agency's system.						
26	TRAFON GROUP, INC. JUAN R. RIVERA FONT 27 GONZALEZ GIUSTI SUITE 602 GUAYNABO, PR 00968	06/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	49492	\$949.24
Reason: Proof of claim purports to assert liability on the basis of submitted invoice. Based on a declaration attesting to a reasonable review of the agency's books and records, there are no outstanding liabilities associated with this invoice in the agency's system.						
					TOTAL	\$451,329.00*